



**Palisades Nuclear Plant**  
Operated by Nuclear Management Company, LLC

October 28, 2004

10 CFR 50.55a

U. S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Palisades Nuclear Plant  
Docket 50-255  
License No. DPR-20

Request for Relief from ASME Section XI Code Requirements for Repair of Reactor Pressure Vessel Head Penetrations – Commitment for License Amendment Request

By letter dated August 2, 2004, Nuclear Management Company, LLC (NMC) submitted the subject relief requests. NMC has completed ultrasonic examinations of the reactor vessel closure head (RVCH), control rod drive (CRD), and incore instrumentation (ICI) nozzle penetrations during the current refueling outage at the Palisades Nuclear Plant, in accordance with Order, EA-03-009, "Issuance of First Revised NRC Order (EA-03-009) Establishing Interim Inspection Requirements for Reactor Pressure Vessel Heads at Pressurized Water Reactors," dated February 20, 2004. NMC has concluded that weld repairs are necessary for two CRD nozzle penetrations, which will require the approval of the subject relief requests to facilitate the necessary repairs. NMC has also determined that a license amendment is necessary to modify the cooldown limits specified in Technical Specification Limiting Condition for Operation (LCO) 3.4.3 "PCS Pressure and Temperature (P/T) Limits," to support these repairs.

This letter provides NMC's commitment to prepare the license amendment request described above in an expedited manner, to support the NRC Staff's review and approval of the subject relief requests. NMC requests approval of the subject relief requests upon receipt of this commitment.

A101  
A047

Summary of Commitments

This letter contains one new commitment and no revisions to existing commitments.

The new commitment is as follows:

NMC will prepare the necessary license amendment request to modify Palisades Technical Specification LCO 3.4.3 "PCS Pressure and Temperature (P/T) Limits," in an expedited manner, to support the NRC Staff's review and approval of the relief requests associated with CRD nozzle penetration repairs.

A handwritten signature in black ink, appearing to read "D. Malone", with the word "for" written in smaller cursive below it.

Daniel J. Malone  
Site Vice President, Palisades Nuclear Plant  
Nuclear Management Company, LLC

CC Administrator, Region III, USNRC  
Project Manager, Palisades, USNRC  
Resident Inspector, Palisades, USNRC